

Wayne I. Munkel, LCSW
St. Louis Lead Prevention Coalition
2256 South Grand Avenue, 2S
St Louis, MO 63104

APR 09 2002

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SUPERFUND RECORDS

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Site:	Herculaneum
ID#	408006266372
Block:	1.0
Other:	4-9-02

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Dear Mr. Munkel:

This is in response to Anthony Camillo's letter dated January 31, 2002, which you forwarded to Christie Todd-Whitman, concerning lead contamination in Herculaneum, Missouri.

First, I want to thank you for providing very detailed comments on this important issue. The letter points out many areas of concern including lead contamination in homes, schools, residential soils, ambient air, as well as elevated lead levels in children's blood. You provided a summary of lead data found in home interiors, schools, soils, blood, and ambient air, all of which indicate a serious concern to the residents of Herculaneum. The letter also concludes with a request urging the U.S. Environmental Protection Agency (EPA) to permanently relocate the residents of Herculaneum.

Our highest priority remains the exposure of children to lead in Herculaneum. As the letter indicates, EPA along with the Missouri Department of Natural Resources (MDNR) have required Doe Run to undertake actions to address lead contamination. The approach being taken has two goals. One goal is to quickly remove historic lead contamination from yards, homes, and other areas where young children or others can come in contact with lead. The second goal is to quickly reduce the lead emissions from the smelter operations to prevent recontamination.

To address this first goal, EPA and MDNR have ordered Doe Run to implement an expedited program to remove contaminated soils, and clean the interiors at homes, play areas, and schools. To address the second goal, EPA and MDNR have required Doe Run to install additional air emission controls on their operation, as well as develop and implement a materials transportation plan to address lead releases which have been found to occur as a result of transporting materials through the town. In addition, we have developed a program to offer residents with young children the opportunity to be temporarily relocated. This is the temporary relocation mentioned in the letter. Such a temporary relocation will be offered until the actions to address the exposure of young children to contaminated soil and indoor dust are completed.

Some of the additional air emission controls referred to above were installed in July 2001, with additional controls required by July 2002. MDNR continues to monitor the ambient air concentrations of lead in the Herculaneum area. At this time, the air monitoring data looks encouraging. Based upon preliminary data collected by MDNR, some of the lowest monitored lead concentrations are being seen at the monitor which has been consistently above the ambient standard in the past. Although this data is encouraging, we will continue to require the additional controls to be installed by July 2002, and will continue to monitor the ambient air.

ARTD: APETRUSKA: cschmaltz: Disk 3: LEADCOALITION AX-0202515 Due 03-22-02

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EPA and MDNR have been working closely with the Missouri Department of Health and Senior Services (MHSS), and the Agency for Toxic Substances and Disease Registry (ATSDR) to help ensure that the required actions will effectively protect public health. These agencies have done considerable work in the Herculaneum community to collect blood samples from residents as well as students in the Herculaneum schools. We will continue to work with these agencies to determine the risks posed by lead in the community.

One area where the residents of Herculaneum have consistently expressed concern is the potential for recontamination. EPA and MDNR have reviewed historic recontamination rates on previously cleaned yards and believe that these rates have been too high. EPA is in the early stages of implementing a recontamination monitoring plan that will measure the rates of recontamination. EPA will not allow Doe Run to recontaminate the residential yards in Herculaneum at a level that would trigger a cycle of continuous residential yard cleanups.

We will continue to evaluate the risks to the residents of Herculaneum as well as the required actions to be taken to address those risks. By working with MDNR, MHSS, and ATSDR we intend to take whatever actions are determined necessary to address the lead contamination in Herculaneum. If at any time we believe that the permanent relocation of residents is a necessary action to protect the residents of Herculaneum, especially young children, we will pursue that action.

Although EPA has not determined that the permanent relocation of residents is necessary, an agreement was recently reached between the state of Missouri and Doe Run that calls for Doe Run to buy-out homes, on a voluntary basis, that are located in close proximity to the smelter. While not directly a party to this agreement, EPA welcomes it as it provides additional and immediate protection of the health of the young children who are at greatest risk due to the location of their home. At the same time, this agreement does not alter any of Doe Run's commitments in existing orders with the agency.

Once again, we appreciate your interest in this most important issue. If you have any questions, please contact Tony Petruska of my staff at 913-551-7637.

Sincerely,

James B. Gulliford
Regional Administrator

cc: Anthony Camillo
St. Louis Lead Prevention Coalition
Dave Mosby
MDNR
Denise Jordan-Izaguirre
ATSDR
Gale Carlson
MHSS